UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 04-10179-RGS

DEXTER BROWN

MOTION FOR LEAVE TO DEPART JURISDICTION

Now comes the defendant in the above matter and moves that he be granted leave to depart the jurisdiction. If granted, he will travel to Myrtle Beach, South Carolina, by vehicle, on May 22, 2005 and return on June 1, 2005. While in Myrtle Beach he will reside at the Landmark Hotel. The purpose of the trip is to attend a motorcycle rodeo.

In support of the motion the defendant says that he has received a draft of the presentence report, which appears to be favorable. And, the Government has already responded, stating that it has no objections.

By his attorney,

WILLIE J. DAVIS

BBO#: 116460

Davis, Robinson & White One Faneuil Hall Marketplace

Willie J. Dans

Boston, MA 02109 (617) 723-7339

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of the within motion for leave to depart the jurisdiction was served upon the Government this 10th Day of May, 2005 by mailing a copy thereof to Assistant United States Attorney, Antoinette Leoney, United States Courthouse, One Courthouse Way, Boston, MA 02210; and to Pretrial Services by mailing a copy thereof to Thomas O'Brien at the same address.

WILLIE J. DAVIS